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14 *Attorneys for Defendant*
15 **GOOGLE LLC**

16 UNITED STATES DISTRICT COURT
17 CENTRAL DISTRICT OF CALIFORNIA

18
19 CHRISTOPHER BARULICH,
20 individually and on behalf of all others
similarly situated,

21 Plaintiff,

22 v.

23 THE HOME DEPOT, INC., a Delaware
corporation, and GOOGLE LLC, a
24 Delaware limited liability company,

25 Defendants.

Case No. 2:24-cv-01253-FLA-JC

**DECLARATION OF KRISTINE
FORDERER IN SUPPORT OF JOINT
STIPULATION TO EXTEND TIME TO
RESPOND TO INITIAL COMPLAINT
BY MORE THAN 30 DAYS (L.R. 8.3)**

Complaint Served: February 23, 2024
Current Deadline: March 14, 2024
New Response Date: May 13, 2024

1 I, Kristine Forderer, declare as follows:

2 1. I am an attorney at the law firm of Cooley LLP and an attorney of record
3 for Google LLC (“Google”) in the above-captioned matter. I am licensed to practice
4 law in the state of California and am admitted to practice before this Court. I submit
5 this declaration in support of the Joint Stipulation to Extend Time to Respond to the
6 Initial Complaint By More Than 30 Days (L.R. 8.3) (“Stipulation”) in compliance
7 with this Court’s standing order, and make this declaration based on my personal
8 knowledge.

9 2. On February 14, 2024, Plaintiff filed a class action complaint
10 (“Complaint”) in this action against Google and Home Depot, Inc. (“Home Depot”).
11 ECF No. 1. Google was served with the summons on February 22, 2024. ECF No.
12 15.

13 3. Google recently retained Cooley as counsel in this action.

14 4. Soon after being retained, Cooley reached out to counsel for Plaintiff to
15 request a 60-day extension, to which they agreed. Cooley then drafted the Stipulation,
16 coordinated with counsel for Home Depot to incorporate their feedback, and obtained
17 assent to file the Stipulation from counsel for Plaintiff.

18 5. The requested extension is necessary so that Google and its counsel can
19 fully assess the claims and defenses at issue, continue investigating the facts
20 surrounding Plaintiff’s allegations, identify the governing contractual agreements,
21 and explore consolidation of this case with a similar case filed in the Northern District
22 of California on October 23, 2023, pending before the Honorable Rita F. Lin,
23 captioned *Ambriz v. Google LLC*, No. 23-cv-05437. The requested extension also
24 would provide Home Depot sufficient time to locate any records of Plaintiff’s alleged
25 calls to Home Depot. The requested 60-day extension is for same the amount of time
26 Google would have had to respond to the Complaint had Plaintiff sought a waiver of
27 service (which Google would have agreed to).

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